

Hand-Delivered

UNITED STATES DISTRICT COURT

for the

DWestern District of North Carolina

Charlotte Division

FILED
CHARLOTTE, NC

JUN 23 2025

US DISTRICT COURT
WESTERN DISTRICT OF NC

Juanita Purdy

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Charlotte Mecklenburg School Board
Dr. Crystal L. Hill, Superintendent
Dr. Susann Nash, Executive Director,
Dr. Shannon Clemens, Principal

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

3:25-cv-441-GCM

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Juanita Purdy
Street Address	3015 Meadow Knoll Dr.
City and County	Charlotte, Mecklenburg
State and Zip Code	North Carolina, 28269
Telephone Number	850-390-5162
E-mail Address	ixpurdy@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Charlotte Mecklenburg School Board
Job or Title (<i>if known</i>)	Governing Body
Street Address	600 E. Fourth Street, Fifth Floor
City and County	Charlotte, Mecklenburg
State and Zip Code	North Carolina, 28202
Telephone Number	980-343-5139
E-mail Address (<i>if known</i>)	boardcomms@cms.k12.nc.us

Defendant No. 2

Name	Dr. Crystal L. Hill
Job or Title (<i>if known</i>)	Superintendent
Street Address	4421 Stuart Andrew Blvd
City and County	Charlotte, Mecklenburg
State and Zip Code	North Carolina, 28217
Telephone Number	980-343-3000
E-mail Address (<i>if known</i>)	crvstall.hill@cms.k12.nc.us

Defendant No. 3

Name	Dr. Susann Nash
Job or Title (<i>if known</i>)	Executive Director Human Relations
Street Address	4339 Stuart Andrew Blvd
City and County	Charlotte, Mecklenburg
State and Zip Code	North Carolina 28217
Telephone Number	980-343-6254
E-mail Address (<i>if known</i>)	susannm.nash@cms.k12.nc.us

Defendant No. 4

Name	Dr. Shannon D. Clemons
Job or Title (<i>if known</i>)	Principal
Street Address	1100 Eastway Drive
City and County	Charlotte, Mecklenburg
State and Zip Code	North Carolina 28205

Telephone Number

980-343-6450

E-mail Address (if known)

shannond.clemons@cms.k12.nc.us

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name

Turning Point Academy - High School

Street Address

8701 Moores Chapel Rd

City and County

Charlotte, Mecklenburg

State and Zip Code

North Carolina 282

Telephone Number

980-343-5231

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):

☐

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)☒

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)☐

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)☐

Other federal law (specify the federal law):

☐

Relevant state law (specify, if known):

☐

Relevant city or county law (specify, if known):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☒ Other acts *(specify)*: Hostile Work Environment

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

9/28/2023, 10/17-18/2023, 11/2/2023, 11/16/2023, 1/11/2024, 1/24/24, 2/2/24, 3/1/24, 3/6/24, 6/20/24, 7/10/24

C. I believe that defendant(s) *(check one)*:

- ☐ is/are still committing these acts against me.
- ☒ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- | | | |
|-------------------------------------|----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | race | <div style="border: 1px solid black; height: 20px; width: 150px;"></div> |
| <input type="checkbox"/> | color | <div style="border: 1px solid black; height: 20px; width: 150px;"></div> |
| <input type="checkbox"/> | gender/sex | <div style="border: 1px solid black; height: 20px; width: 150px;"></div> |
| <input type="checkbox"/> | religion | <div style="border: 1px solid black; height: 20px; width: 150px;"></div> |
| <input type="checkbox"/> | national origin | <div style="border: 1px solid black; height: 20px; width: 150px;"></div> |
| <input checked="" type="checkbox"/> | age <i>(year of birth)</i> | <div style="border: 1px solid black; padding: 2px;">1964</div> <i>(only when asserting a claim of age discrimination.)</i> |
| <input type="checkbox"/> | disability or perceived disability <i>(specify disability)</i> | <div style="border: 1px solid black; height: 20px; width: 150px;"></div> |

- E. The facts of my case are as follows. Attach additional pages if needed.

1. Introduction

Plaintiff, an experienced educator of six years, brings this complaint against Defendants for unlawful age discrimination in violation of the Age Discrimination in Employment Act (ADEA), retaliation under Title VII and applicable state law, and the creation of a severe and pervasive hostile work environment under Title VII. As detailed below, Defendants engaged in disparate treatment, subjected Plaintiff to adverse employment actions for engaging in protected activity, and tolerated escalating threats and unsafe conditions that substantially altered the terms and conditions of employment.

2. Age Discrimination

2.1 Unequal and Disparate Terms

CMS Board policy P-HSME forbids harassment of any employee; plaintiff was subjected to an environment where other employees were allowed to openly undermine her by permitting BMTs to instruct students that they need not follow her directives. This was selectively enforced against Plaintiff—an older teacher—reflecting an intent to discredit and force her from the workplace.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

07/01/2024 but was not assigned an investigator until 12/15/2024

- B. The Equal Employment Opportunity Commission (check one):

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on (date)

3/27/2025

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☒

60 days or more have elapsed.

☐

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff respectfully requests that the Court:

- a. Declare that Defendants' actions constitute age discrimination, unlawful retaliation, and the maintenance of a hostile work environment;
- b. Award back pay, front pay, and compensatory and punitive damages;
- c. Grant injunctive relief preventing further discriminatory or retaliatory conduct; and
- d. Award fees, costs, and such other relief as the Court deems just and proper.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

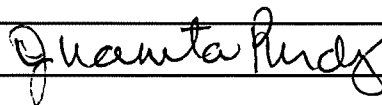
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

6/23/2025

Signature of Plaintiff

Juanita Purdy



Printed Name of Plaintiff

Juanita Purdy

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

2.2 Failure to Protect and Age-Related Remarks

During the 2022–23 school year, Defendants exhibited a pattern of neglect in protecting elderly teachers from severe assault incidents. In one case, students forcibly removed a teacher's hair and taunted her; in another, the violence precipitated a "teacher walkout." These assaults went unaddressed by the BMTs and administration. In Plaintiff's own classroom, hostile students were allowed to return after threatening remarks such as, "You old bitch, you must want to get hit," and were told, "You know how she is—she's mean," and "You need to respect your elders; she's a grandma."

2.3 Impact on Work Environment

By tolerating the assaults, selectively enforcing contractual clauses, and condoning age-based taunts, Defendants created an unsafe and demeaning workplace that targeted Plaintiff's age, undermined her authority, and inflicted emotional distress.

3. Retaliation

3.1 Protected Activity

On or about August 18, 2023, in her capacity as CMAE representative, Plaintiff advised a distressed colleague to report a Title IX allegation to Human Relations after administration failed to follow required protocol. This advice constituted protected activity.

3.2 Adverse Employment Actions

Shortly thereafter, despite an unfounded finding by Human Relations, Plaintiff was subjected to heightened scrutiny, unfounded performance critiques, and a marked shift from collegial to punitive treatment.

3.3 Causal Connection

During the August 18 meeting, Plaintiff directly questioned Dr. Clemons, Mr. Armstrong, and Dean Aylisa Bryant about procedural failures; each responded dismissively. Within days—immediately following the clearing of the accused employee—Defendants' treatment of Plaintiff turned hostile, establishing a direct causal link between her protected activity and the adverse actions taken against her.

3.4 Additional Retaliatory Incidents

On October 17, 2023, the Principal Intern entered Plaintiff's classroom and aggressively "growled" at her. Two days later, that administrator forced a visiting teacher to leave Plaintiff's room, isolating her from colleagues and signaling punitive intent. This effort to isolate the plaintiff from happened on a continuous basis.

4. Hostile Work Environment (Severe and Pervasive)

4.1 Initial Incidents

- a. Dean Bryant attempted to sabotage Plaintiff's formal observations by altering schedules and withholding information.
- b. Hostile students who threatened Plaintiff were repeatedly returned to her classroom, never disciplined or removed.

4.2 Escalation of Dangerous Conditions

- c. Defendants allowed a highly volatile student to carry a sharp pair of teacher scissors and a mirror with a broken handle into Plaintiff's classroom.
- d. The principal refused to address disparaging comments, BMTs' stalking behavior, and constant surveillance of Plaintiff's classroom when colleagues visited.

4.3 Unethical Administrative Directives

- e. Dr. Clemons unethically compelled Plaintiff to continue teaching an advanced science student who had returned to her home school, undermining Plaintiff's professional integrity.

4.4 Physical Threats and Property Damage

- f. Plaintiff's car windshield was shattered on campus.
- g. She received veiled threats via phone.
- h. Her work computer was intruded upon, an intrusion the district later denied.

Collectively, these incidents established a work environment that was both severely hostile and pervasive, compromising Plaintiff's safety, well-being, and ability to perform her duties.